

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JOHN WILSON,

Defendant.

Cr. No. 19-10080-LTS

**DEFENDANT JOHN WILSON'S ASSENTED TO MOTION FOR LEAVE TO FILE A  
REPLY BRIEF IN SUPPORT OF HIS MOTION FOR RETURN OF FUNDS**

Defendant John Wilson moves that the Court grant him leave to file by August 18, 2023 a Reply Brief in support of his Motion for Return of Funds Held for Forfeiture (DE 2701). In support of this motion Wilson states:

1. Before Wilson filed his Motion for Return of Funds, his counsel attempted to conduct a meet and confer with the government by email. Defense counsel hoped to confer on two topics: (1) would the government agree to return the \$1,000,000 to Wilson, and (2) if not, on what grounds was the government holding the funds. The government would not discuss the matter with Wilson's counsel and either did not reply or gave nonresponsive answers to several emails. A copy of this email exchange is attached as Exhibit A.
2. The government filed its Opposition (DE 2708) to Wilson's motion on August 7, 2023. The Opposition raises factual allegations and legal arguments that the government did not disclose in the attempted meet and confer, and that Wilson could

not have prognosticated. Thus, Wilson needs to file a substantial reply brief to address issues that the government first raised in its Opposition to Wilson's motion.

The government has informed Wilson's counsel that it assents to Wilson's Request for Leave.

Dated: August 8, 2023

Respectfully submitted,

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/s/ Michael Kendall

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